

Raymond L. Bodnar, Esq for
Bodnar Trust U/A dated 12/28/2001, Respondent
17008 SW Sapri Way
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September 15, 2021

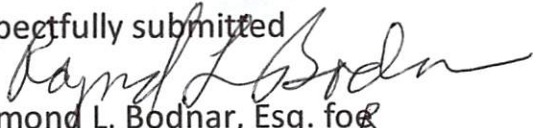
Clerk's Office
United States District Court
Room 150 Federal Building
San Juan Puerto Rico 00918-1767
In Re; Promesa No 17 BK 3283 -LTS

Dear Sir/Madam:

Raymond L. Bodnar, Esq, as legal counsel for Respondent Bodnar Trust U/A dated December 28, 2001 here refiles the Respondent's Objections pursuant to the order of the District Court to correct the deficient pleadings. Respondent hereby files the following refiled documents in opposition to Petitioner's Motion to partially disallow and partially reclassify Respondents Proof of Claim No 6850:

- 1) Respondent's Objection to Disallowance and Reclassification of Claim No 6850
- 2) Respondent's Affidavit Supporting its Objections
- 3) Proposed Order of Denial of Motion

Respectfully submitted


Raymond L. Bodnar, Esq. for
Bodnar Trust U/A dated 12/28/2001

CC: Council for Oversight Board – Proshauer Rose LLP

Council for Creditor's Committee – Paul Hasting LLP

Mailed September 15, 2021

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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

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CLERK OF COURT
U.S. DISTRICT COURT
SAN JUAN, P.R.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In Re: PROMESA

THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO RICO	:	No.17 BK 3283 – LTS
As representative of	:	Respondent's Objection to
THE COMMONWEALTH OF PUERTO RICO et	:	Disallowance and
Al.	:	Reclassification of Claim #6850
Debtors	:	

THREE HUNDRED FIFTY-FIFTH OMNIBUS OBJECTION OF THE COMMONWEALTH
OF PUERTO RICO AND THE PUERTO RICO HIGHWAY AND TRANSPORTATION
AUTHORITY FOR PETITIONER'S MOTION FOR PARTIALLY DISALLOWANCE AND
RECLASIFICATION OF CLAIM NO 6850

Raymond L. Bodnar, as an attorney of the State of New Jersey and legal
counsel for the Respondent hereby refiles the previously filed objections for the
Bodnar Trust U/A dated December 28, 2001 pursuant to the order of the United

States District Court for the District of Puerto Rico to hereby correct the deficient pleadings, as follows:

1. Bodnar Trust U/A dated 12/28/2001, (“Respondent”), has title to \$25,000 Bond of Puerto Rico Highway and Transportation Authority 5.250% due July 1, 2034 CUSIP # 745190r67 (“HTA”) held in an investment account with Charles Schwab.

2. Respondent did file substantial documents showing said ownership of HTA Bond as a proof of claim and such claim was designated as Claim No 6850.

3. Petitioner asserts that the HTA Bond of Respondent is duplicated under Master Proofs of Claim and requests an Order for partially disallowance of Claim No 6850.

4. Petitioner asserts that Claim No 6850 is a liability claim against Puerto Rico Electric Power Authority and requests an Order to reclassify the claim

5. Assertions of Petitioner either are based upon inaccurate facts and lacking any evidence as to Master Proofs of Claim, which duplicate Respondent’s HTA Bond and related Claim # 6850, as refuted hereinafter.

6. Master Proofs of claims #37245, #38574 and #32622, submitted by Bank of New York Mellon (“BNYM”) with respect to its trusteeship of certain HTA Bonds do not duplicate Respondent’s Claim # 6850 relating to Respondent’s HTA Bond with CUSIP # 745190R67, since BNYM denies any knowledge of Respondent’s HTA Bond, as verified by the attached supporting affidavit of Raymond L. Bodnar – See EXHIBIT I

7. Disallowance of Claim No 6850 is not supported since Petitioner does not submit any other supporting Master Proofs of Claims with specific claim numbers or the name of the organizations submitting such Master Proofs of Claim, which allegedly duplicate the Respondent’s HTA Bond in order for Respondent to verify the accuracy of Petitioner’s allegation of duplication, as verified by supporting Affidavit of Raymond L. Bodnar – see Exhibit I.

8. Reclassification of Respondent’s HTA Bond and Proof of Claim #6850 as a liability residing with the Puerto Rico Electric Power Authority is based upon inaccurate facts, submitted by Petitioner to this Court. Respondent’s Proof of Claim #6850 relates solely to its \$25,000 Bond of Puerto Rico Highway and Transportation Bond 5.25% due July 1, 2034 CUSIP # 745190R67. Respondent’s Proof of Claim # 6737 relates solely to its \$25,000 bond of Puerto Rico Electric

Power Authority Bond 5% due 7/1/23 CUSIP # 7452QCL4. The foregoing separate Proofs of Claim for different Bonds is verified in the attached supporting Affidavit of Raymond L. Bodnar – see Exhibit I.

WHEREFORE the Respondent hereby demands that the Petitioner's motion to disallow or reclassify Claim No 6870 be denied based upon Petitioner's failure to present accurate facts and Petitioner's failure to submit verifiable evidence as to any Master Proofs of Claim with specific claim numbers and name of submitting organization, which allegedly duplicate Respondent's HTA Bond.

Dated:

9/15/21


Raymond L. Bodnar, Esq for

Bodnar Trust U/A dated 12/28/2001

Cerrtification of Raymond L. Bodnar

Raymond L. Bodnar hereby certifies and affirms that the foregoing information is true. I am aware that if such information is willfully false, I am subject to punishment.

Dated:

9/15/21

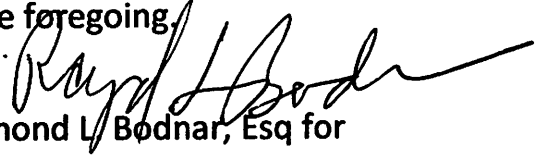

Raymond L. Bodnar, Esq

Certification of Service

I, Raymond L. Bodnar, Esq hereby certify and affirm that these pleadings were served upon (a) Clerk's Office US District Court for District of Puerto Rico, (b) Council for Oversight Board – Proshauer Rose LLP and (c) Counsel for Creditor's Committee Paul Hasting LLP by ordinary mail on September 15, 2021 with ample postage for delivery to the foregoing.

Dated

9/15/21


Raymond L. Bodnar, Esq for

Bodnar Trust U/A dated 12/28/2001